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Acting Under Authority Conferred by 28 U.S.C. § 515
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Attorneys for the United States

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

JOSE SUSUMO AZANO MATSURA (1),
aka Mr. A.,
aka Mr. Lambo,
RAVNEET SINGH (2),
aka Ravi Singh,
ELECTIONMALL, INC. (3),
MARCO POLO CORTES (4),
EDWARD SUSUMO AZANO HESTER (5),
aka Susu,
aka Junior,

Defendants.

Case No. 14CR0388-MMA

Date: April 8, 2016
Time: 2:00 p.m.

**JOINT MOTION TO EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT FROM
MAR. 8 TO APR. 4, 2016**

The United States of America and the above-captioned defendants, who are on bond, jointly move to exclude the time from March 8, 2016, through April 4, 2016, from the Speedy Trial Act calculations because: (1) there are pretrial motions pending that require a hearing, *see* 18 U.S.C. § 3161(h)(1)(D); and (2) the ends of justice served by excluding time outweigh the best interests of the public and the defendants in a speedy trial, *see* 18 U.S.C. § 3161(h)(7)(A).

The following facts support the requested time exclusion:

1. There are pending pretrial motions that require a hearing. *See* Docs. 101, 146. At today's hearing, the parties briefly addressed the merits of Cortes' request for discovery of Encinas's SDPD personnel file. At the April 4, 2016 motion hearing date,

1 DATED: March 8, 2016

/s/ Knut S. Johnson
KNUT S. JOHNSON
Counsel for Mr. Azano Matsura (1)

2
3 DATED: March 8, 2016

/s/ Michael L. Lipman
MICHAEL L. LIPMAN
Duane Morris LLP
Counsel for Mr. Singh (2)

4
5
6 DATED: March 8, 2016

/s/ Frank T. Vecchione
FRANK T. VECCHIONE
Counsel for ElectionMall, Inc. (3)

7
8
9 DATED: March 8, 2016

/s/ Nancy B. Rosenfeld
NANCY B. ROSENFELD
Counsel for Mr. Cortes (4)

10
11
12 DATED: March 8, 2016

/s/ Joshi A. Valentine
JOSHI A. VALENTINE
Counsel for Mr. Azano Hester (5)
(Special Appearing)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE SUSUMO AZANO MATSURA (1),
aka Mr. A.,
aka Mr. Lambo,
RAVNEET SINGH (2),
aka Ravi Singh,
ELECTIONMALL, INC. (3),
MARCO POLO CORTES (4),
EDWARD SUSUMO AZANO HESTER (5),
aka Susu,
aka Junior,
Defendants.

Case No. 14CR0388-MMA

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury that I have served the foregoing document on the above-captioned party(ies) by:

- ☒ electronically filing it with the U.S. District Court for the Southern District of California using its ECF System, which electronically notifies the party(ies).
- ☐ causing the foregoing to be mailed by first class mail to the parties identified with the District Court Clerk on the ECF System.
- ☐ causing the foregoing to be mailed by first class mail to the following non-ECF participant at the last known address, at which place there is delivery service of mail from the United States Postal Service:

Executed on March 8, 2016.

/s/ Andrew G. Schopler
ANDREW G. SCHOPLER
Assistant U.S. Attorney